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Innessa M. Huot
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June 12, 2020

VIA ECF

The Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom #13C-S
Brooklyn, New York 11201

Re: *Yelena Ruderman v. Law Office of Yuriy Prakhin, P.C., et al.,*
Civil Action No. 1:19-cv-2987 (RJD)(RLM)

Dear Judge Mann:

Please see the attached additional documents which show that Defendants are not being fully truthful to the Court in their assertion that “Mr. Prakhin did not maintain this email account [prakhin@verizon.net] during the timeframe specified in the ESI Protocol.” ECF No. 30 at 2. The timeframe specified in the ESI Protocol is February 1, 2018 to the Present.

We look forward to addressing all other issues at the Court’s convenience.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Innessa M. Huot', written over a light blue circular stamp.

Innessa M. Huot

Cc: Counsel of Record (via ECF)

From: [irene.gabo](#)
To: [Erica Larssen](#); [Yelena Ruderman](#)
Subject: Fwd: Silva Rapoport v. 8223 Bay Parkway, LLC ; Your Claim No: 30178489810-0001 ; Insured: Abland Management & Estates LLC ; Date of Loss: 04/24/2017 ; Our Matter ID: S-EVER-00146
Date: Monday, November 5, 2018 12:17:01 PM
Attachments: [1168589.docx](#)
[ATT00001.htm](#)

Sent from my iPhone

Begin forwarded message:

From: Irene Gabo <Irene@prakhinlaw.com>
Date: November 5, 2018 at 7:13:38 PM GMT+2
To: "irenegabo@msn.com" <irenegabo@msn.com>
Subject: FW: Silva Rapoport v. 8223 Bay Parkway, LLC ; Your Claim No: 30178489810-0001 ; Insured: Abland Management & Estates LLC ; Date of Loss: 04/24/2017 ; Our Matter ID: S-EVER-00146

-----Original Message-----

From: Ursula A. Torruella [<mailto:utorruella@pmtlawfirm.com>]
Sent: Friday, November 02, 2018 5:01 PM
To: prakhin@verizon.net; Irene Gabo
Cc: Wendy A. Eson
Subject: Silva Rapoport v. 8223 Bay Parkway, LLC ; Your Claim No: 30178489810-0001 ; Insured: Abland Management & Estates LLC ; Date of Loss: 04/24/2017 ; Our Matter ID: S-EVER-00146

Dear Prakhin:

This is a follow up on the status of the Settlement Release sent on October 12, 2018. Has it been signed by your client?

Please see attached. And please see below.

Thank you,

Dear Mr. Prakhin:

Attached hereto please find the Release of All Claims to be executed by your client before a notary public. Please return to me, via email, together with an executed Stipulation of Discontinuance with Prejudice and your W-9 Form. And please mail all originals to this office.

I thank you in advance for your prompt attention.

LAW OFFICE OF YURIY PRAKHIN, PC

1883 86th Street, 2nd Floor

Brooklyn, New York 11214

Telephone Number: (718) 946-5099 Facsimile Number: (718) 373-7614

Email: prakhin@verizon.net



“Meliora Cogito”

July 9, 2018

JAMS

Justice Allen Hurkin-Torres

620 Eight Avenue, 34th Floor

New York, NY 10018

Redacted as part of a mediation Statement

From: [Marina Pritsker](#)
To: [Yelena Ruderman](#)
Cc: [Erica Larssen](#); [Patricia Belous](#)
Subject: FW: Bortnick v. Jordan Schur Properties,LLC
Date: Wednesday, November 28, 2018 10:00:55 AM

From: nmonell=recordpress.com@quickbasetools.com
[mailto:nmonell=recordpress.com@quickbasetools.com] **On Behalf Of** nmonell@recordpress.com
Sent: Wednesday, November 28, 2018 9:11 AM
To: prakhin@verizon.net; Office Mail; Yuriy Prakhin
Subject: Bortnick v. Jordan Schur Properties,LLC

Hello Yuriy,

Appellate Division - 2nd Department

Index No: 515175/16

NOA Dated: 10/18/2018

Re: Bortnick v. Jordan Schur Properties,LLC

I write to advise you that your appeal is due on or before 4/18/2019. The expiration date is based on a calculation of six (6) months from the typewritten date on the Notice of Appeal.

Our staff is seasoned in the court's procedural and unwritten rules. Please let me know if you are interested in utilizing our comprehensive appellate management services:

- Record/Appendix Preparation
- Table of Contents
- Pagination & Headers
- Typesetting
- NYSCEF Submissions
- Generation of Required Digital Briefs (bookmarked & hyperlinked to cases & authorities)
- Covers/Printing/Perfect-Binding
- Compliance Review
- Creation of Brief Tables
- Court Filings & E*filings
- Track Court Decisions & Calendar Dates

Reply to this email if you would like an estimate.

If the appeal in this case has already been perfected or settled, kindly alert us to the status of the appeal.

Thank you very much.

Regards,

Natasha R. Monell, Esq.

VP, Staff Counsel
RECORD PRESS
nmonell@recordpress.com

Appellate Management Document Solutions
229 West 36th Street, 8th Floor | New York, NY 10018
T: 212.619.4949 | F: 212.608.3134

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From: Sandra Beron
To: Kristina Hovsepian; Erica Larssen; Patricia Belous; Marina Pritsker; Anna Broxmeyer; Lilit Avetisyan; Stephen Revis; Nick Serlin; Yelena Ruderman; Yesenia Olmedo; Gregory Nahas
Subject: Fwd: Law Office of Yuriy Prakhin PC (OpenRecords Portal)
Date: Thursday, December 13, 2018 11:44:36 AM

Sent from my iPhone

Sandra R. Beron, Esq.
Law Office of Yuriy Prakhin, P.C.
1883 86th Street, 2nd Floor
Brooklyn, N.Y. 11214
P: 718-946-5099
F: 718-373-7614

Begin forwarded message:

From: FOILADMIN <FOILADMIN@dot.nyc.gov>
Date: December 12, 2018 at 3:12:55 PM EST
To: "prakhin@verizon.net" <prakhin@verizon.net>, "yp@prakhinlaw.com" <yp@prakhinlaw.com>
Cc: "lilit@prakhinlaw.com" <lilit@prakhinlaw.com>, "kristinah@prakhinlaw.com" <kristinah@prakhinlaw.com>, "patricia@prakhinlaw.com" <patricia@prakhinlaw.com>, "rachel@prakhinlaw.com" <rachel@prakhinlaw.com>
Subject: Law Office of Yuriy Prakhin PC (OpenRecords Portal)

Good Afternoon Sabina,

As per our discussion today, you can submit new FOIL's electronically to DOT via NYC's OpenRecords Portal at www.nyc.gov/openrecords. Once you submit a FOIL, you will automatically receive the FOIL number assigned to your request. You will also receive an acknowledgment letter within five business days.

Please note that our Agency receives thousands of FOIL requests per year. *Accordingly, we ask that you not submit duplicate requests via the Portal and Regular Mail (or any other method) as searching our requests for duplicate FOILs is an extensive process.*

If you have any questions on how to submit a FOIL electronically, via NYC's OpenRecords Portal please contact us at 212-839-9850.

Thank You,

Megan Garcia
NYC Department of Transportation
FOIL Unit
55 Water Street 4th Floor
New York NY 10041

Please do not reply to this email. If you have any questions regarding this FOIL request, please contact us at 212-839-9850.

This message and any attachments are solely for the individual(s) named above and others who have been specifically authorized to receive such and may contain information which is confidential, privileged or exempt from disclosure under applicable law. If you are not the intended recipient, any disclosure, copying, use or distribution of the information included in this message and any attachments is strictly prohibited. If you have received this communication in error, please notify us by reply e-mail and immediately and permanently delete this message and any attachments.

Thank you.

NYC – Department of Transportation
